



April 29, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. NW
Washington, DC 20554

RE: MB Docket 18-349

Greetings;

I am the sole local owner of Vanguard Media LLC, based in Albuquerque, New Mexico. I am writing in support of opening up the radio broadcast ownership rules.

Vanguard Media or I personally hold FCC licenses of both full-power stations and translators in the Albuquerque area and elsewhere in New Mexico, and last week filed the assignment application to acquire another full-power FM station. I have been in radio broadcast ownership continuously since 1984, in Albuquerque and Santa Fe along with numerous stations in small markets in New Mexico.

Radio broadcasting has evolved considerably in the 35 years I have owned radio stations. In the 80's, we were just starting to feel the effect of alternative sources of entertainment such as cable television, with music-intensive services such as MTV.

In the time since, we have seen the explosion of entertainment and information delivery mechanisms including satellite radio, hundreds of cable and satellite TV and audio channels, and internet content of every imaginable kind, including many thousands of streaming audio services.

The delivery landscape today includes broadcast radio with, still, the largest reach of all audio content providers. That is changing with time, and thus we are preserving our first-to-market advantage with access to our programming through all sorts of devices from smartphones to Alexa smart speakers.

I believe broadcast radio today should simply be thought of as another form of streaming audio content. It happens to be available on over-the-air radio, but as some 30 percent of homes no longer have a radio, our streams are assuming much greater importance.



Today, anyone can start online broadcasting in a matter of minutes using a used computer from Craigslist and free software. Presto, an online radio station, without coverage limitations or regulatory burdens, and with availability on any of a plethora of devices. That is a far cry from the state of radio broadcasting when the present ownership rules were implemented in 1996!

As a longtime local broadcaster, I ask that the Commission implement the change in the radio broadcast ownership rules as proposed by the NAB. Such a change will enable radio broadcasting in general to continue to be viable in an incredibly competitive and diverse audio content marketplace, and my smaller operations – and moreover, our substantial listener base – will benefit by riding the “rising tide”.

Sincerely,

owner, Vanguard Media LLC

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